

## APPENDIX L

### **REPORTS, PLANS AND CERTIFICATIONS** **UNDER THE BENZENE WASTE NESHAP ENHANCED PROGRAM** **PROVISIONS OF PARAGRAPH 18 OF THE CONSENT DECREE IN** **UNITED STATES V. MARATHON ASHLAND PETROLEUM LLC**

Name or Summary of the Report, Plan, or <u>Certification</u>	CD Sub-Para No.	Applicable <u>Refinery(ies)</u> C=Canton; Ct= Cattlesburg; D=Detroit; G=Garyville; R=Robinson; SP=St. Paul; <u>TC=Texas City</u>	Rqd. ("R") v. Contingent (" <u>C</u> ")	One-Time ("1") v. Quarterly (" <u>Q</u> ")	<u>Due Date</u>
BWN Compliance Review and Verification Report	C.ii.	All but D & R	R	1	270 D after Lodging
Amended BWN Compliance Review and Verification Report	C.iii.	All but D & R	C	1	90 D after completing additional sampling requested by EPA
Amended TAB Report	D.i	All but D & R	C	1	60 D after completing BWN Compliance Review and Verification Report
Plan for SP to comply w/ 6 BQ if SP's TAB equals or is greater than 10	D.ii.	SP	C	1	180 D after completing BWN Compliance Review and Verification Report
Plan for C, Ct, G, and/or TC to come into compliance if BWN Compliance Review and Verification Report shows non-compliance	D.iii	C; Ct; G; TC	C	1	60 D after completing BWN Compliance Review and Verification Report

Compliance Certification	D.v	C; Ct; G; TC	C	1	30 D after completing all actions necessary to come into compliance
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Report certifying installation of dual canisters	E.i.	All but SP	R	1	300 D after Lodging
Waste/Slop/Off-Spec Oil Schematics	J.i.	All	R	1	90 D after Lodging
Revised Waste/Slop/Off-Spec Oil Schematics	J.i.	All	C	1	Mutually-agreed upon time between MAP and EPA
Schedule to complete installation of controls on waste management units handling organic benzene waste	J.ii.	All but SP	C	1	Mutually-agreed upon time between MAP and EPA, not to exceed 2 years
Plan to quantify uncontrolled waste/slop/off-spec oil movements	J.iv.	All	R	1	90 D after EPA has approved schematics
EOL Sampling Plan	K.i; L.i; M.ii	All	R	1	C, Ct, G, TC — 4 Mos. after Lodging; R – 5/1/03; D – 11/1/03; SP – 30 D after EPA and MAP meet at SP
EOL Revised Sampling Plan	K.ii; L.i; M.ii	All	C	As needed	If and when MAP becomes aware of factors indicating original plan no longer accurately reflects EOL benzene quantity
Plan to ensure that uncontrolled benzene does not equal or exceed, as applicable, 2, 6, or 10 Mg/yr, or that it is minimized	K.-vii; L.i; M.v	All	C	1	30 D after the end of the Q in which the projected calendar year benzene quantity is equal to or greater than 2, 6, or 10 Mg.

Proposal for Third-Party TAB Study and Compliance Review	K.-viii; L.i; M.vi	All	C	1	C, Ct, D, G, R, TC – Last day of 4 <sup>th</sup> Q as set forth in ¶ K.viii. SP – As agreed bet. EPA and MAP
Third-Party TAB Study and Compliance Review	K.-viii; L.i; M.vi	All	C	1	30 D after receipt of the Third-Party Study and Compliance Review
Plan to implement the results of the Third-Party TAB Study and Compliance Review	K.-viii; L.i;	All but SP	C	1	90 D after MAP receives the Third-Party TAB Study and Compliance Review
Plan for SP to comply w/ 6 BQ if Third-Party TAB Study and Compliance Review so warrants	M.vi	SP	C	1	120 D after MAP receives the Third-Party TAB Study and Compliance Review
Report on installation of closed loop sampling devices	O.i.	All	R	1	180 D after Entry
Results of study of “breakthrough” in carbon canisters	O.ii.	N/A	R	1	90 D after completion of study
Lab audits done from 1 yr. prior to Lodging through 1 <sup>st</sup> Q in which the 1 <sup>st</sup> quarterly report is due	G.i;P .ii- a.(1)	N/A	R	Q	C,Ct,G, TC – 1 <sup>st</sup> Section 61.357 Report due after Entry; D,R,SP – 1 <sup>st</sup> Qtrly Report due under Decree

Continuing lab audits	G.i; G.ii; P.ii-c.(1)	N/A	R	Q	C,Ct,G,TC – Each Section 61.357 Report D,R–Each Qtrly Report due under the Decree, until D and/or R are able to, and do, opt to include this info in Section 61.357 Reports SP–Each Qtrly Report due under the Decree
Report on training done between Lodging and the 1 <sup>st</sup> Q in which report is due	Li; Lii; P.ii-a.(2)	All	R	Q	C,Ct,G, TC – 1 <sup>st</sup> Section 61.357 Report due after Entry; D,R,SP – 1 <sup>st</sup> Qtrly Report due under Decree
Report on training done in that Q	Li; Lii; Liii; Liv; P.ii-c(2)	All	R	Q	C,Ct,G,TC – Each Section 61.357 Report D,R–Each Qtrly Report due under the Decree, until D and/or R are able to, and do, opt to include this info in Section 61.357 Reports SP–Each Qtrly Report due under the Decree
Results of Qtrly Sampling at G of 10 ppm-exempted streams of >0.1 Mg/yr benzene for the period between Lodging and the 1 <sup>st</sup> Q in which report is due	L.ii; P.ii-a(3)	G	R	Q	1 <sup>st</sup> Section 61.357 Report due after Entry
Results of Qtrly Sampling at G of 10 ppm-exempted streams of >0.1 Mg/yr benzene for the quarter	L.ii; P.ii-c(4)	G	R	Q	In each Section 61.357 Report

Results of annual sampling at SP of >0.05 Mg/yr benzene streams	M.i; P.ii-b.	SP	R	Q	In the first Qtrly Report for the first calendar Q of each year
Results of 3 Months of Monthly EOL Results	K.iii L.i; P.ii-c(3)	All but SP	R	Q	C,Ct,G,TC – Each Section 61.357 Report D,R–Each Qtrly Report due under the Decree, until D and/or R are able to, and do, opt to include this info in Section 61.357 Reports
Results of Sampling of > 0.05 Streams	K.iv K.v; L.i; P.ii-c(3)	All but SP	C	Q	C,Ct,G,TC – Each Section 61.357 Report D,R–Each Qtrly Report due under the Decree, until D and/or R are able to, and do, opt to include this info in Section 61.357 Reports
Results of Sampling of > 0.03 Streams	K.vi L.i; P.ii-c(3)	All but SP	C	Q	C,Ct,G,TC – Each Section 61.357 Report D,R–Each Qtrly Report due under the Decree, until D and/or R are able to, and do, opt to include this info in Section 61.357 Reports
Results of Quarterly EOL Sampling at SP	M.iii P.ii-c(3)	SP	R	Q	In each Qtrly report

